33 East Main Street Suite 900 Madison, Wisconsin 53703 608.251.5000 Fax 608.251.9166 www.quarles.com Attorneys at Law in Chicago Indianapolis Madison Milwaukee Naples Phoenix Scottsdale Tampa Tucson Washington, D.C.

Writer's Direct Dial: 608.283.2434 E-Mail: william.toman@quarles.com

July 30, 2018

HAND DELIVERED

Michael Mancusi-Ungaro Insurance Financial Examiner - Licensing Specialist Bureau of Financial Analysis and Examinations Wisconsin Office of the Commissioner of Insurance 125 S. Webster Street Madison, WI 53703-3474

Re: Change No. 3 dated July 27, 2018 to the Form A in the Matter of the Acquisition of Control of Health Tradition Health Plan by WEA Insurance Corporation

Dear Mike:

In connection with the referenced Form A dated June 25, 2018, we hereby submit, on behalf of WEA Insurance Corporation and pursuant to Wis. Admin. Code § Ins 40.14(2), the following sub. (c) to be added to Form A Item 2, Identity and Background of Applicant:

(c) Furnish a chart or listing clearly presenting the identities of the interrelationships among the applicant and all affiliates of the applicant. Indicate in such chart or listing the percentage of voting securities of each such person which is owned or controlled by the applicant or by any other such person. If control of any person is maintained other than by the ownership or control of voting securities, indicate the basis of such control. As to each person specified in such chart or listing indicate the type of organization (e.g., corporation, trust, partnership) and the state of domicile. If court proceedings involving a reorganization or liquidation are pending with respect to any such person, indicate which person, and set forth the title of the court, nature of proceedings and the date when commenced.

An organizational chart presenting the identities of and the interrelationships among WEA Insurance Corporation and its affiliates after the proposed acquisition of control of HTHP is attached as <u>Appendix 6</u>. <u>Appendix 6</u> without HTHP is a current organizational chart for WEA Insurance Corporation. No court proceedings involving a reorganization or liquidation are pending with respect to WEA Insurance Corporation or any of its affiliates.

Michael Mancusi-Ungaro July 30, 2018 Page 2

Pursuant to the requirements of Wis. Admin. Code § Ins 40.02(1)(b)1., a copy of this submission is also being sent simultaneously to counsel for HTHP.

If you have any questions, please do not hesitate to contact me or Vaughn Vance, Vice President and General Counsel of WEA Insurance Corporation, at (608) 276-4000 or vvance@weatrust.com. Thank you for your consideration.

Very truly yours, QUARLES & BRADY LLP

William J. Toman

Enclosure

cc(w/enc.): Vaughn L. Vance

Kevin G. Fitzgerald